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9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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12 FUZZYSHARP TECHNOLOGIES
13 INCORPORATED,

14 Plaintiff,

15 vs.

16 NVIDIA CORPORATION,

17 Defendant.
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19 NOW COMES Plaintiff, FUZZYSHARP TECHNOLOGIES INCORPORATED
20 ("FST"), through its attorneys, and files this Complaint for Patent Infringement and Demand for
21 Jury Trial against Nvidia Corporation ("Nvidia"). In support thereof, Plaintiff FST states as
22 follows:
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FILED
2012 DEC 17 P 1:52
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CV 12 6375
Civil Action No.
**COMPLAINT FOR PATENT
INFRINGEMENT AND DEMAND FOR
JURY TRIAL**

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1. This is an action for patent infringement of United States Patent No. 6,172,679 (hereinafter “the ‘679 Patent”), and United States Patent No. 6,618,047 (hereinafter “the ‘047 Patent”) pursuant to the laws of the United States of America as set forth in Title 35 Sections 271 and 281 of the United States Code.
2. This court has subject matter jurisdiction over this action pursuant to 28 U.S.C. Sec. 1338(a) and 28 U.S.C. Sec. 1331.
3. Venue is proper in this judicial district under 28 U.S.C. § 1391(d) and 1400 (b) because Defendant Nvidia has committed acts of infringement in this Federal District.
4. Plaintiff FST, is a corporation organized under the laws of the State of Texas.
5. On information and belief, Defendant Nvidia is a Delaware Corporation, and has a corporate office at 2701 San Tomas Expressway, Santa Clara, CA 95050.

INTRADISTRICT ASSIGNMENT

6. This is an action for Patent Infringement, which is an excepted category under Civil L.R. 3-2(c). Pursuant to Civil L.R. 3-2(c), this action is assigned on a district-wide basis.

CAUSES OF ACTION FOR PATENT INFRINGEMENT

7. On January 9, 2001, the '679 Patent entitled "VISIBILITY CALCULATIONS FOR 3D COMPUTER GRAPHICS", was duly and legally issued to Hong Lip Lim, as the sole patentee.
8. The '679 Patent is assigned entirely to Plaintiff FST
9. Plaintiff FST is the sole owner of the '679 Patent, and has standing to bring this action.
10. On September 9, 2003, the '047 Patent entitled "VISIBILITY CALCULATIONS FOR 3D COMPUTER GRAPHICS", was duly and legally issued to Hong Lip Lim, as the sole patentee.

1 11. The '047 Patent is assigned entirely to FST.

2 **COUNT ONE**

3 12. Plaintiff FST, repeats and incorporates herein the allegations contained in
4 paragraphs 1 through 11 above.

5 13. Defendant Nvidia is engaged in wilful direct, and/or indirectly infringement of at
6 least one claim of the '679 Patent pursuant to 35 U.S.C. § 271(a) at least by
7 selling, and offering to sell Graphic Processors Units capable of performing
8 occlusion culling during the computer graphics rendering process.

9 14. Plaintiff previously sued Nvidia on November 16, 2009, thereby providing good
10 notice of patent infringement to Nvidia and Nvidia has willfully continued its
11 patent infringement.

12 **COUNT TWO**

13 15. Plaintiff, FST, repeats and incorporates herein the allegations contained in
14 paragraphs 1 through 11 above.

15 16. Defendant Intel is engaged in direct, and/or indirect infringement of at least claim
16 1 of the '0479 Patent pursuant to 35 U.S.C. § 271(a) at least by selling, and
17 offering to sell Graphic Processors Units capable of performing occlusion culling
18 during the computer graphics rendering process.

19 17. Plaintiff previously sued Nvidia on November 16, 2009, thereby providing good
20 notice of patent infringement to Nvidia and Nvidia has willfully continued its
21 patent infringement.

JURY DEMAND

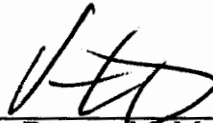
18. Pursuant to Fed. R. Civ. P. 38, Plaintiff hereby demands a jury trial as to all issues in this lawsuit.

1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff respectfully requests this Court to:

- 3 a. Enter judgment for Plaintiff on this Complaint for the Defendant;
4 b. Order that an accounting be had for the damages caused to the Plaintiff by the
5 infringing activities of the Defendant;
6 c. Award Plaintiff additional damages due to willful patent infringement;
7 c. Award Plaintiff interest and costs; and
8 d. Award Plaintiff such other and further relief as this Court may deem just and
9 equitable.

10 THE PLAINTIFF
11 FUZZYSHARP TECHNOLOGIES
12 INCORPORATED

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